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*Attorneys for Plaintiff*

IN THE UNITED STATES DISTRICT COURT

IN AND FOR THE NORTHERN DISTRICT OF CALIFORNIA

CYNTHIA SILVA, as Successor in Interest of  
 the ESTATE OF BRITTNEY SILVA;  
 CYNTHIA SILVA, an individual;

Plaintiffs,

vs.

UNION PACIFIC RAILROAD COMPANY, a  
 corporation; NATIONAL PASSENGER  
 RAILROAD CORPORATION dba AMTRAK,  
 a corporation; MICHAEL JENECKE,  
 individually; CITY OF SAN LEANDRO; and  
 DOES 1 through 100;

Defendants.

CASE NO. C 14-05673 JSW

**JOINT STIPULATION AND  
~~PROPOSED~~ ORDER REGARDING  
 CONTINUANCE OF ALL PRE-TRIAL  
 DATES AND TRIAL DATE AS MODIFIED**

Trial Date: January 30, 2017  
 Time: 8:00 a.m.  
 Hon. Jeffrey S. White

**JOINT STIPULATION**

The parties to the above-captioned action, through their attorneys of record, hereby  
 submit this Joint Stipulation and [Proposed] Order allowing twenty depositions per party and  
 continuing the trial date and all pre-trial dates for the above-captioned case;

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1 WHEREAS, on November 13, 2015 the Court granted an order continuing all case  
2 management dates, setting forth the following deadlines:

3 Jury Trial: January 30, 2017 at 8:00 a.m. (3 week est.)

4 Jury Selection: January 25, 2017 at 8:00 a.m.

5 Pretrial Conference: January 9, 2017 at 2:00 p.m.

6 Last Day for Dispositive Motions: November 4, 2016 at 9:00 a.m.

7 Last Day for Expert Discovery: August 31, 2016

8 Last Day for Expert Disclosure: June 24, 2016

9 Close of Non-Expert Discovery: May 27, 2016

10 WHEREAS, despite diligent efforts, coordinating several deposition have been difficult  
11 as witnesses are located throughout California and out of state.

12 WHEREAS, the parties have agreed that each party should be allowed a total of twenty  
13 depositions per party.

14 WHEREAS, all parties agree that further time is needed to continue discovery and are  
15 working diligently to ensure the most efficient process.

16 WHEREAS, good cause exists for the continuance.

17 NOW, THEREFORE, IT IS HEREBY JOINTLY STIPULATED, by and between the  
18 parties, through their respective counsel of records, and subject to the Court's approval, that the  
19 dates previously set by this Court be continued as follows:

20 Jury Trial: March 6, 2017 at 8:00 a.m. (3 week est.)

21 Jury Selection: February 1, 2017 at 8:00 a.m.

22 Pretrial Conference: January 23, 2017 at 2:00 p.m.

23 Last Day for Dispositive Motions: December 9, 2016 at 9:00 a.m.

24 Last Day for Expert Discovery: November 30, 2016

25 Last Day for Expert Disclosure: September 23, 2016

26 Close of Non-Expert Discovery: August 26, 2016  
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3 Dated: May 23, 2016

Harris Personal Injury Lawyers, Inc.

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6 By:       /s/Katie McIver  
7 Katie McIver  
8 Attorney for Plaintiffs

9 Dated: May 11, 2016

Flesher Schaff & Schroeder, Inc.

10  
11 By:       /s/Jason Schaff  
12 Jason Schaff  
13 Attorney for Defendants Union Pacific Railroad  
14 Company, Amtrak, and Thomas McKeown

15 Dated: May 11, 2016

Bertrand, Fox, Elliot, Osman and Wenzel

16  
17 By:       /s/Gregory M. Fox  
18 Gregory M. Fox  
19 Attorney for Defendants  
20 City of San Leandro

21 Dated: May 11, 2016

The Scranton Law Firm

22 By:       /s/Louis Beary  
23 Louis Beary  
24 Attorney for Plaintiff  
25 Eric Silva  
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1 The Court, having reviewed the parties' stipulation hereby GRANTS the parties'  
2 stipulation allowing twenty depositions per party and a continuance as follows:  
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4 CASE MANAGEMENT DEADLINES:

5 Jury Trial: ~~March 6, 2017 at 8:00 a.m.~~ (3 week est.) February 13, 2017 at 8:00 a.m.

6 Jury Selection: ~~February 1, 2017 at 8:00 a.m.~~ February 8, 2017 at 8:00 a.m.

7 Pretrial Conference: January 23, 2017 at 2:00 p.m.

8 Last Day for Dispositive Motions: December 9, 2016 at 9:00 a.m.


9 Last Day for Expert Discovery: November 30, 2016

10 Last Day for Expert Disclosure: September 23, 2016

11 Close of Non-Expert Discovery: August 26, 2016  
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14 PURSUANT TO STIPULATION, IT IS SO ORDERED:  
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17 Dated: May 24, 2016  
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20 HONORABLE JEFFREY S. WHITE  
21 UNITED STATES DISTRICT COURT  
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